04/27/04

EPA World Trade Center Technical Panel: Comments and Recommendations from the April 12, 2004

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In the short period of time that I have had to assemble these thoughts, I have tried to speak with members of the diverse WTC community. However, as you know, it's impossible for me to reach out to every community group. Therefore, I may have missed important ideas that may need to be added at a later date. Thank you.

Comments

It is my understanding and the understanding of other community representatives that were at the April 12th meeting that the EPA World Trade Center Technical Panel (Panel) agreed to:

- Not limit the testing to only asbestos to determine if the dust that is present is WTC dust
- Test spaces that have not been cleaned by the EPA, as well as spaces that have been cleaned by the EPA
- Test non-residential (work spaces, firehouses, schools/day care centers) spaces, as well as residential spaces
- Develop a more reliable method than visual inspection, such as environmental sampling, for testing for HVACS.

Recommendations

1. **EPA must conduct comprehensive and representative testing** by collecting samples from indoor spaces, in concentric circles radiating outward from the World Trade Center site to determine the boundary of WTC contamination. Expand the sampling program to include Chinatown and Brooklyn.
    - **a.** EPA sampling must include Chinatown, especially in light of the health impact documented in the recent retrospective study of 205 Chinese-American children who received medical care at the Charles B. Wang Community Health Center in Chinatown, about 1.5 miles from the World Trade Center (published in the peer-reviewed Journal of Allergy and Clinical Immunology, March 2004)
    - **b.** Include Brooklyn since the WTC plume went over Brooklyn.
2. **EPA must sample a variety of interior spaces from residential (EPA cleaned or tested to non-EPA cleaned or tested) to commercial workspaces to schools/day care centers to fire houses. Include common areas.**
    a. Sampling should be both standardized (a set of tests, to include window wells, performed in every interior space sampled) and site specific (additional tests developed for each interior space specific to that space such as inside

ventilation ducts, inside or behind air conditioning/heating units, above ceiling tiles, carpets, etc.).

3. **Test for a variety of chemicals in both indoor air and settled dust**
    a. Those chemicals must include, but not be limited to, the list of Contaminants of Potential Concern (COPCs) listed in the World Trade Center Indoor Environmental Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks:
        - Dioxin
        - PAHs
        - Lead
        - Asbestos
        - Fibrous Glass
        - Crystalline Silica
    b. Commercial space example: Deustche Bank building
        - "'…a combination of contaminants known to be hazardous to human health, unparalleled in any other building designed for office use, permeates the entire structure,'" said a damage report prepared last year for Deutsche Bank, the owner. These include asbestos, lead, mercury, dioxins, polychlorinated biphenyls, polynuclear aromatic hydrocarbons and World Trade Center dust…." (The New York Times, "A Survivor Faces a Slow Death, Piece by Piece," 04/16/04)
    c. Remember that the Synergy of WTC contaminants is unknown and that the government does not have adequate guidelines on the synergistic or additive effects of toxic chemicals (including endocrine disruptors).
4. **Use-State-of-the-Art Monitoring & electron microscope technology and fiber-counting protocols: including surface samples and dust characterization.** Use transmission electron microscopy (TEM) to sample for asbestos fibers in the dust since polarized light microscopy (PLM) is outdated. Count all asbestos fiber lengths.
5. **Incorporate third party oversight of the EPA testing, sampling and analysis.** Use split sampling.
6. **Involve the impacted communities in the development and implementation of the sampling program.** This is important to increase the likelihood of obtaining meaningful results. EPA must establish a publicly available administrative record, with documents entered in real time. Up-to-date records should be available at several public library branches and on-line.
7. **Don't use lead paint in older buildings as an excuse for not testing for lead.** For example, EPA wipe sampling discovered significantly elevated lead levels in a building on Duane Street constructed well after the use of lead paint was banned.
    a. When sampling in older buildings, record whether or not there is visual evidence of chipped or deteriorating paint to help distinguish older buildings with lead-based paint hazards from older buildings without lead-based paint hazards. Such reporting will be useful to determine the source of elevated lead levels in buildings built before the use of lead paint for building interiors was banned.
8. **Consider outdoor activities that may influence inside air quality**
    a. Demolition of the Deutsche Bank building at 130 Liberty

b. Likely de-construction of Fiterman Hall (Borough of Manhattan Community College) at 30 West Broadway
c. Demolition of the Fulton Street Transportation Station (on Broadway between Fulton & John Streets)
d. Major renovation of the South Ferry Subway Station
e. Routine construction activities of rebuilding at the WTC site